

228-502

5/6/2014

1/11

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MAY - 6 2014

Carrie M. Tackema
Nufarm Americas Inc.
4020 Aerial Center Parkway, Suite 101
Morrisville, NC 27560

Subject: Notification to include two optional marketing claims "Nufarm Grow a better tomorrow", "Grow a better tomorrow" per PRN 98-10

Dear Ms. Tackema:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10, dated April 23, 2014, for "Mallet 2.5 G Insecticide," EPA Reg. No. 228-502.

The Registration Division (RD) has conducted a review of your request for applicability under PRN 98-10, and finds that the action requested falls within the scope of PRN 98-10. The label submitted with your application has been stamped "Notification" and added to the product record.

If you have any questions, please contact me directly at 703-347-0559 or email me at marchese.jacquelyn@epa.gov.

Sincerely,

Jacquelyn Marchese

Jacquelyn Marchese
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)
Office of Pesticide Programs

EXPEDITE

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United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other:

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 228-502	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Mallet 2.5 G Insecticide	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas Inc. 4020 Aerial Center Parkway, Suite 101 Morrisville, NC 27560 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

- Amendment – Explain below.
- Final printed label in response to Agency letter dated : _____
- Resubmission in response to Agency letter dated _____
- "Me Too" Application
- Notification - Explain below.
- Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

NOTIFICATION PER PRN 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

CONTACT: Carrie M. Tackema (919) 379-2528 or carrie.tackema@us.nufarm.com

Nufarm Americas, Inc.
4020 Aerial Center Parkway, Suite 101
Morrisville, NC 27560

NOTIFICATION

MAY - 6 2014

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product				<input type="checkbox"/> Lithograph	
				<input type="checkbox"/> Paper glued	
				<input checked="" type="checkbox"/> Other <u>Crack and Peel</u>	
				<input type="checkbox"/> Stenciled	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

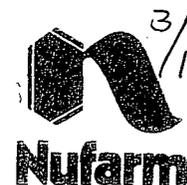
Name Carrie M. Tackema	Title Regulatory Manager	Telephone No. (Include Area Code) (919) 379-2528
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Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received
(Stamped)

2. Signature 	3. Title Regulatory Manager	
4. Typed Name Carrie M. Tackema	4. Date April 23, 2014	



+1 919.379.2511
+1 919.467.5921
4020 Aerial Center Parkway, Suite 10
Morrisville, NC 27566
www.nufarm.com

Via Courier Delivery

April 23, 2014

Ms. Venus Eagle, PM#1
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

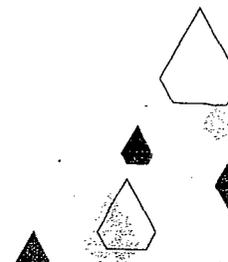
RE: NOTIFICATION(s) per PRN 98-10

Nuprid 2 F Insecticide	EPA Reg. No. 228-484
Mallet 2F Insecticide/Grub Ex Pro	EPA Reg. No. 228-485
Mantra 2F Insecticide	EPA Reg. No. 228-486
Nuprid 1.6F Insecticide	EPA Reg. No. 228-488
Mallet 0.2% on Fertilizer	EPA Reg. No. 228-500
Mallet 0.5 G Insecticide	EPA Reg. No. 228-501
Mallet 2.5 G Insecticide	EPA Reg. No. 228-502
Mallet 0.2 Granular Insecticide	EPA Reg. No. 228-510
Mantra 1G Greenhouse and Nursery Insecticide	EPA Reg. No. 228-523
Mallet 1.47% Concentrate	EPA Reg. No. 228-525
Nuprid 4.6F Insecticide	EPA Reg. No. 228-527
Nuprid 4F Insecticide	EPA Reg. No. 228-528
Nuprid-S WG	EPA Reg. No. 228-529
Atera GC 2+1 SC Insecticide	EPA Reg. No. 228-557
Mallet 7.1% PF Insecticide	EPA Reg. No. 228-562
Nuprid 2SC Soil/Foliar Insecticide	EPA Reg. No. 228-572
Mallet 0.2 G	EPA Reg. No. 228-587
Mallet 75 WP	EPA Reg. No. 228-588
Mantra 60 WSP	EPA Reg. No. 228-681
Mallet 2F T&O Insecticide	EPA Reg. No. 228-695
Kilter Insecticide	EPA Reg. No. 228-717
Bounty Turf and Ornamental Insecticide	EPA Reg. No. 1001-82

Dear Ms. Eagle:

Enclosed please find twenty-two (22) application(s) for pesticide registration – NOTIFICATION for the above-referenced product(s). The purpose of these NOTIFICATION(s) is to include two (2) optional marketing claims:

Nufarm Grow a better tomorrow
Grow a better tomorrow



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Page 2 of 2

These NOTIFICATION(s) are consistent with PRN 98-10; specifically, II N. In support of these NOTIFICATION(s) enclosed are the following:

- EPA form 8570-1 Application for Pesticide Registration – NOTIFICATION; and
- Proposed product labeling in PDF format on CD-rom.

Please contact me at directly at (919) 379-2528 or by email at carrie.tackema@us.nufarm.com if you have any questions regarding this action.

Sincerely,



Carrie M. Tackema
Regulatory Manager

Enclosure(s)

5/11

Mallet[®] 2.5 G

INSECTICIDE

FOR SYSTEMIC INSECT CONTROL IN ORNAMENTAL PLANTS

ACTIVE INGREDIENT:

Imidacloprid 2.5%

OTHER INGREDIENTS:..... 97.5%

TOTAL: 100.0%

Not for sale, sale into, distribution and/or use in Nassau, Suffolk, Kings, and Queens counties in the state of New York.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

NOTIFICATION

MAY - 6 2014

EPA REG. NO. 228-502
EPA EST. NO. _____

MANUFACTURED FOR
NUFARM AMERICAS INC.
11901 South Austin Avenue
Alsip, IL 60803



NET CONTENTS _____ GALS. (____ L)

[Nufarm: Grow a better tomorrow]
[Grow a better tomorrow]

000228-00502.20140423.NOTIF

6/11

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. **DO NOT** apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

DO NOT contaminate water when disposing of equipment washwaters.

Groundwater Advisory

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Note to Reviewer: the two statements in brackets below may be used as they relate to *Tilia* species:

[**DO NOT** apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.]

[**DO NOT** apply this product, by any application method, to linden, basswood or other *Tilia* species.]

OPTION 1 (existing approved specific use directions, simplified method)

This product comes ready to use with no mixing necessary. This product aids in ant management and controls sucking pests. It can be applied around shrubs and small trees by spreading directly beneath the base of the tree or shrub.

This product is for use on ornamental shrubs and small trees in outdoor landscapes and interior plantscapes. It is a systemic insecticide and will be taken up by the roots and translocated upward within the plant system. Therefore watering after application makes the product more available for uptake.

Systemic activity using this soil application treatment method can be delayed until the active ingredient is translocated throughout the plant. For this reason, applications work best when made prior to pest infestation or before pest populations become severe.

INSECTS CONTROLLED

- | | |
|------------------------------------|---|
| Adelgids | Leaf beetles (including Elm leaf & Viburnum leaf beetles) |
| Aphids | Leafhoppers |
| Black vine weevil (larvae in soil) | Psyllids |
| Japanese beetle (adults) | Whiteflies (including fig [ficus] whitefly) |
| Lace bugs | |

WHERE TO APPLY

Shrubs and small trees in outdoor landscapes and interior plantscapes.

USE RATE

Select rate according to height of shrub or tree: Up to 4 ft. – use ¼ to ½ cup; 4 to 8 ft. – use ½ to 1 cup. Use the high rate within the range for initial treatment and lower rates for re-application, if needed.

HOW AND WHEN TO APPLY

Spread appropriate rate evenly around the base of plant under foliage, whenever pests are seen or found. Re-apply as needed based on pest re-infestation or at 4 to 8 week intervals. Apply early before pest populations become severe. Irrigation or rainfall is necessary within 24 hours following application. Pull back mulch and weed barrier before application. **DO NOT** apply to frozen or water-logged areas, as this may decrease the product's effectiveness.

NOTE: 1 level cup is approximately 6 ounces of this product.

ANT MANAGEMENT

Use this product to control aphids and other sucking pests on ornamentals to limit the honey dew available as a food source for ant populations. Applications can then be supplemented with remedial sprays, bait placements or other ant control tactics to further reduce pest populations.

USE RESTRICTIONS

DO NOT apply near fish pools, ponds, streams or lakes.

DO NOT apply to soils which are frozen, waterlogged, or saturated which will reduce delivery of product into the root zone of the plants.

DO NOT apply more than 16 lbs of product (0.4 lbs ai) / acre or 0.37 lbs (6 oz.) of product / 1,000 square feet / year.

DO NOT use kitchen utensils to measure or apply this product.

OPTION 2 (new proposed alternate specific use directions for single application / yr)

This product comes ready to use with no mixing required. This product is for use on ornamental plantings in outdoor landscapes and interior plantscapes. It is a soil applied systemic insecticide and will be taken up by the roots and translocated upward within the plant system. Watering after application makes the product more available for uptake. Systemic activity can be delayed until the active ingredient is translocated throughout the entire plant.

ORNAMENTAL PESTS CONTROLLED

Adelgids	Leafminers (including Birch and Boxwood)
Aphids	Mealybugs
Armored Scales (suppression)	Pine tip moth larvae
<u>Borers</u>	Psyllids
Round-headed (including Eucalyptus longhorned)	Royal Palm bugs
Flat-headed (including Alder and Bronze birch)	Root weevil larvae (including Black vine weevil)
Bark beetles (suppression)	Sawfly larvae
Fungus Gnats	Soft scales (including lobate lac scales)
Japanese beetle (adults)	Thrips
Lace bugs	Whiteflies (including fig [ficus] whitefly)
Leaf beetles (including Elm leaf & Viburnum leaf beetles)	White grub larvae (including Japanese beetle, Chafer, European chafer, Oriental beetle, Asiatic garden beetle)
Leafhoppers (including Glassy-winged sharpshooter)	

WHERE TO APPLY

For use on shade trees and other ornamental trees, including listed fruit and nut trees:

Apple	Loquat	Oriental Pear	Pecan
Crabapple	Mayhaw	Pear	Quince

For use on shrubs, and container plants in outdoor landscapes and interior plantscapes.

WHEN TO APPLY

Apply early before pest populations become severe. Irrigation or rainfall is necessary within 24 hours following application. See "USE RESTRICTIONS" section below for use on bearing fruit & nut trees.

HOW MUCH TO APPLY

Tree with one trunk: Measure distance (in inches) around tree trunk at chest height. A flexible tape measure is an appropriate method (tool). Apply [___ capfuls] [0.125 cup] (0.65 oz) of this product for each inch of distance around the trunk.

Trees with multiple trunks: Measure the distance (in inches) around each trunk at chest height and add together. Multiply this total by 0.75. This is the number of [___ capful] [0.125 cup] (0.65 oz) increments to apply around the tree trunk. Example: A tree has 3 trunks. They measure 16, 10, and 6 (inches) for a total of 32 (inches). 32 X 0.75 = 24 increments. [24 X 0.125 cups = 3 cups] [24 X ___ capfuls = ___ capfuls] [24 X 0.65 oz = 15.6 oz].

NOTE: the amount needed for trees w/ multiple trunks is less than the amount needed for a single trunk tree of same total diameter.

Shrubs: Measure the height of the shrub to the nearest foot. Apply [___capfuls] [0.375 cup] (2.0 oz) of this product for each foot (12-inches) of shrub height.

Container plants: Apply the quantity of this product specified for the size container being treated.

- 1 gallon container = 1 teaspoon [tsp]
- 3 gallon container = 1 tablespoon [tbsp]
- 5 gallon container = 1 ¼ tablespoon [tbsp]

[tsp= teaspoon] [tbsp= tablespoon]

HOW TO APPLY

Water in granules immediately after application with a sufficient volume of water to wet the soil to a depth of 3-4 inches. Before application, pull back any mulch or weed barrier that will inhibit even spreading and watering in of granules. Brush or wash off any granules adhering to plant foliage.

Trees: For trees with a distance around the trunk of [<] [less than] 30 ["] [inches] apply product to the soil in a circle around the tree a distance of approximately 2 feet out from the base of tree. For trees with a distance around the trunk of [>] [greater than] 30 ["] [inches] apply product to the soil in a circle 3-4 feet out from the base of the tree.

Shrubs: For shrubs [<] [less than] 3 feet tall, apply product evenly to the soil 1 foot out from the base of the shrub. For shrubs [>] [greater than] 3 feet tall, apply product evenly to the soil 2 feet out from the base of the shrub.

Container plants: Spread required amount of product evenly over the potting soil around the base of plant foliage and water thoroughly. For the first 10 days **DO NOT** water the container to the point that water overflows or leaks out the bottom of container. For indoor plantings, bring outdoors to make treatment and return plantings indoors when no excess water is present.

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USE RESTRICTIONS

DO NOT apply near fish pools, ponds, streams or lakes.

DO NOT apply to soils which are frozen, waterlogged, or saturated which will reduce delivery of product into the root zone of the plants.

DO NOT make more than 1 application per year.

DO NOT apply more than 16 lbs of product (0.4 lbs ai) / acre or 0.37 lbs (6 oz.) of product / 1000 square feet / year.

DO NOT apply to bearing fruit trees (apple, crabapple, loquat, Mayhaw, pear, quince) within 21 days of harvest

DO NOT apply to bearing nut trees (pecan) within 7 days of harvest.

DO NOT use kitchen utensils to measure or apply this product.

STORAGE AND DISPOSAL

DO NOT contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, or feed. Store in original containers and out of the reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Improper disposal of excess pesticide is a violation of Federal law.

SPILLS: If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this material.

DO NOT walk through spilled material. Dispose of as directed for pesticides above, or apply uncontaminated product according to Directions For Use. Keep unauthorized people away. For chemical spill, leak, fire, or exposure, you may contact CHEMTREC at 800-424-9300.

CONTAINER DISPOSAL: Nonrefillable container. **DO NOT** reuse or refill this container. Offer for recycling if available, or if recycling is not available, place empty container in trash.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BYWAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you DO NOT agree with or DO NOT accept any of the directions for use, the warranty disclaimers, or limitations on liability, DO NOT use the product, and return it unopened to the Seller, and the purchase price will be refunded.

10/11

(RV042314)

Mallet is a registered trademark of Nufarm Americas, Inc.

NOTE TO REVIEWER:

THE FOLLOWING MARKETING CLAIMS MAY APPEAR ON PRODUCT LABEL, ADVERTISING LITERATURE, AND WEBSITES FOR PRODUCTS UTILIZING **OPTION 1** SPECIFIC USE DIRECTIONS:

1. For use on outdoor landscapes and interior plantscapes.
2. (4 lbs) Treats 20 small trees or shrubs.
3. [Protects/Defends/Guards] Trees & Shrubs from listed insects.
4. [Protects/Defends/Guards] new growth
5. Systemic insecticide taken up by roots and carried through the entire plant.
6. Kills insects and prevents re-infestation

THE FOLLOWING MARKETING CLAIMS MAY APPEAR ON PRODUCT LABEL, ADVERTISING LITERATURE, and WEBSITES FOR PRODUCTS UTILIZING **OPTION 2** SPECIFIC USE DIRECTIONS:

1. [Protects/Defends/Guards] Trees & Shrubs from listed insects.
2. [Protects/Defends/Guards] trees, shrubs, and plants from listed insect damage with one easy treatment
3. [Protects/Defends/Guards] new growth
4. Systemic insecticide taken up by roots and carried through the entire plant.
5. Kills listed insects and prevents re-infestation
6. Ready to spread granules- no mixing
7. Up to 12 months [of insect] [Protection/Defense/Control/Prevention] [against listed insects]
8. Insect [Protection/Defense/Control/Prevention] for up to 12 months
9. [Protects/Defends/Guards] for up to 12 months
10. Provides up to [1,2... 12] months continuous release [Protection/Defense/Control/Prevention] [for trees] [&] [shrubs] [guaranteed! or your money back]
11. [concentrated] [for use on] [Covers/[Protects/Defends/Guards]/Treats] [large areas / large numbers of trees & shrubs]
12. [concentrated] [for use on] [Treats / For] larger areas
13. Rainproof/Rainfast [Protection/Defense/Control/Prevention]
14. Guaranteed [Results] or your money back
15. Great value!
16. Great value per tree [&/or shrub]!
17. Treats 50% More [Trees & Shrubs]*
* vs. Ortho Tree & Shrub Insect Control Ready-To-Spray [EPA Reg. No. 228-525-239]
* vs. 32 oz. 1.47% Imidacloprid liquid concentrate formula [EPA Reg. No. 228-525-239]
18. (4 lbs) [Covers/Protects/Defends/Guards/Treats] 11 trees that measure 8 inches around trunk. (will vary by same proportion based on net contents)
19. (4 lbs) [Covers/Protects/Defends/Guards/Treats] 13 shrubs that are 2 feet tall. (will vary by same proportion based on net contents)
20. No dark green rings [around/at tree base]
21. [Provide sufficient nutrition with / For best feeding results use] Miracle-Gro Tree & Shrub Fertilizer Spikes or other Miracle-Gro products
22. Easy [to use] Measuring [cap]
23. Quick & Easy Measuring [cap]
24. AccuDose Measuring [cap]
25. Coverage Chart: (will vary by same proportion based on net contents)
 - a. (4 lbs) 11 trees (8 inches around)
 - b. (4 lbs) 13 shrubs (2 feet tall)
 - c. (4 lbs) 125 containers (5 gallon size)
26. [Formulated for/Developed for] [large[r] areas] [large numbers of trees] [& shrubs]
27. Up to Year-long [Protection/Defense/Control/Prevention] for trees & shrubs.
28. Systemic [Protection/Defense/Control/Prevention] from/against/for/of [any combination of listed insects].
29. Easy to use/apply [granules] [Just sprinkle at plant base] [for up to 12 months of worry-free care]
30. Kills and prevents listed insects [like.. any combination of listed insects] for up to 12 months.
31. Compare and save!
32. [Lots of trees?] [and shrubs?] Save money, [buy insect product name] [the] [concentrated/the concentrate] [product]